

I respectfully request that the **FCC deny this petition, RM-10521, made by Mr. Michael Trahos**. I offer the following list of reasons for the FCC's consideration as to why I am in opposition to this petition:

1. Legal-to-use FRS radios that don't require a license are readily available for sale in the USA at many retail outlets. Many types of stores now sell these and they are very inexpensive. Any visitor from another country can easily purchase a pair of these for use while they are in our country.

2. Cellular phones can also be rented for use by people visiting the USA if they require wireless communication. Also, some newer "world" cellular phones are now sophisticated and flexible enough to be taken from country to country and operate on the various systems of each country. These cell phones are becoming more common and less expensive as time passes.

3. If, as the petition suggests, these PMR 446 transceivers are allowed into the USA even on a temporary basis, this will only make it that much harder for Customs and the FCC to stop the illegal importation of these offending radios.

4. Mr. Trahos claims in his petition that if adopted, it would have "extreme *de minimis* impact on existing ARS operations" which I find absurd. As a licensed amateur radio operator myself, who often uses the 70cm band, it is obvious to me that these ½ Watt PMR 446 will MOST DEFINITELY cause interference to amateur radio operations. From a mountain top location (as is often the case in amateur repeater systems) the interfering signals from these PMR 446 radios will be heard for many miles. For example, from my mountain top location, I can receive similar powered FRS radios very easily from 25 miles away even with a simple low-gain antenna! I am sure glad that these FRS radios have their own frequency allocation and aren't in one of the amateur bands! Why would we want to pollute the 70cm amateur band with signals from unlicensed radios that weren't even made to be used in the USA? We already have an allocation specifically for this, called the Family Radio Service! Apparently Mr. Trahos has never visited a densely populated area and doesn't realize that the 70cm band is VERY crowded. The last thing we need is non radio savvy people trying to talk to each other with their illegal radios on amateur allocations! It should also be noted that these densely populated areas are exactly where tourists often visit.

5. The petitioner's statement that the use of PMR 446 radios in the US "are essentially unenforceable" is an incredibly dumb reason to make them legal, even on a temporary basis for visitors. Gee Mr. Trahos, we also have problems keeping taxi drivers and fisherman off our two meter amateur band, and bootleg "Cbers" off our ten meter amateur band, should we make them legal too? Our governments have a lot of problems stopping people from speeding in their cars, stealing, murdering, and raping, should we make these things legal too? This goofy reasoning defies logic and common sense. This is very sad for a man with such an impressive education and background. We are a nation of rules and laws, not excuses and exemptions for every ill-conceived reason somebody can dream up!

6. Mr. Trahos suggests that his proposal will somehow promote international public interest or goodwill, which makes little or no sense to me. I wonder what kind of "goodwill" will be promoted when visitors from Europe can't use their PMR 446 radios because US amateurs are legally talking with each other on their much more powerful radios and gain antennas which have signals so strong that they wipe out the weaker PMR 446 signals.

7. If this petition is approved, it will also open the door to other similar petitions from advocates wanting to allow other transceiver types brought in from other countries to be used on a "temporary" basis in the USA. This would set a very bad precedence that should be stopped cold right here with this petition.

In summary, RM-10521 is riddled with problems. These problems greatly outweigh any supposed benefits, which seem to be doubtful to exist anyway. Even if the problems were minor, and they are not, it makes no sense to make this kind of change to the Rules especially when FRS radios are so inexpensive and readily available.